

CAL DOOLEY
PRESIDENT AND CEO



October 19, 2018

Acting Administrator Andrew Wheeler
Office of the Administrator, 1101 A
United States Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington DC 20460

Dear Acting Administrator Wheeler:

The American Chemistry Council and our members strongly support U.S. international regulatory cooperation efforts as a means of preventing the imposition of future tariff and non-tariff barriers to trade in chemicals and maintaining high levels of health and environmental protection. We believe the active presence of U.S. Environmental Protection Agency (EPA) staff is necessary as negotiations on regulatory cooperation opportunities continue.

The recently announced U.S.-Mexico-Canada Agreement (USMCA) contains state of the art risk-based provisions to promote regulatory cooperation in chemicals regulation. These provisions are a solid foundation for enhanced regulatory cooperation with the European Union, Japan, and the United Kingdom, among others. We believe that enhanced regulatory cooperation on chemicals can help align regulatory requirements, create greater certainty and predictability in the regulatory and trading environments, and establish resource efficiencies for both government and commercial interests.

Actively leveraging the opportunities for regulatory cooperation on chemicals is consistent with the Administration's interests in enhancing the competitiveness of American manufacturing. In the U.S.-Canada Regulatory Cooperation Council, for example, we are already beginning to realize the promise of enhanced cooperation in tangible results. In order for regulatory cooperation with other markets to succeed, the sustained involvement of EPA staff will be a necessary component of the U.S. negotiating team.

We look forward to working with you and your staff, the Office of the U.S. Trade Representative, and other U.S. government agencies, to ensure that chemical regulatory cooperation provisions in future trade agreements meets or exceeds the standard in the USMCA.

Sincerely,


Cal Dooley

